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(702) 388-6336

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA,	)	<b>2:14-CR-00262-JCM-GWF</b>
	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
PATRICK LYNN WASHINGTON,	)	
	)	
Defendant.	)	
_____	)	

**STIPULATION TO CONTINUE SENTENCING HEARING**

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Daniel Hill, Esq., counsel for Defendant PATRICK LYNN WASHINGTON, that the presently-scheduled sentencing hearing be continued from December 8, 2015 at 10:00 a.m. to a date and time convenient for this Court, but in no event sooner than one (1) week.

This stipulation is entered for the following reasons:

1. Counsel for the Government will be in trial in the matter of *United States v. Michael Beale*, 2:15-cr-156-JAD-PAL, which commences on December 8, 2015.

1           2.       Counsel for both parties require additional time to adequately research issues  
2 likely to arise during the course of the sentencing proceedings, as well as to file sentencing  
3 memoranda.

4           3.       The additional time requested herein is not sought for purposes of delay, but  
5 merely to allow the Government to have continuity of counsel at the Defendant's sentencing  
6 hearing, as well as for both parties to have adequate time to effectively prepare for the hearing,  
7 taking into account due diligence.

8           4.       Additionally, denial of this request for continuance could result in a miscarriage  
9 of justice.

10          5.       This is the second stipulation filed herein to continue the sentencing hearing.

11          DATED: November 30, 2015.

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13               /s/\_\_\_\_\_  
14 PHILLIP N. SMITH, JR.  
15 Assistant United States Attorney  
16 Counsel for the United States

17               /s/\_\_\_\_\_  
18 DANIEL HILL, ESQ.  
19 Counsel for Defendant PATRICK WASHINGTON  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA, ) **2:14-CR-00262-JCM-GWF**  
)  
)  
Plaintiff, )  
)  
v. )  
)  
PATRICK LYNN WASHINGTON, )  
)  
Defendant. )  
\_\_\_\_\_)

**FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the Government will be in trial in the matter of *United States v. Michael Beale*, 2:15-cr-156-JAD-PAL, which commences on December 8, 2015.

2. Counsel for both parties require additional time to adequately research issues likely to arise during the course of the sentencing proceedings, as well as to file sentencing memoranda.

3. The additional time requested herein is not sought for purposes of delay, but merely to allow the Government to have continuity of counsel at the Defendant's sentencing hearing, as well as for both parties to have adequate time to effectively prepare for the hearing, taking into account due diligence.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. This is the second stipulation filed herein to continue the sentencing hearing.


1 **CONCLUSIONS OF LAW**

2 The additional time requested herein is not sought for purposes of delay, but merely to  
3 allow the Government adequate time to prepare and file a response, taking into account due  
4 diligence. The failure to grant said continuance would likely result in a miscarriage of justice.

5 **ORDER**

6 IT IS THEREFORE ORDERED, that the presently-scheduled sentencing hearing, set for  
7 December 8, 2015 at 10:00 a.m., is continued to December 22, 2015, at 10:00 a.m.

8 DATED December 1, 2015.

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11 UNITED STATES DISTRICT JUDGE  
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